### UNITED STATES DISTRICT COURT DISTRICT OF MARYLAND NORTHERN DIVISION

In the Matter of the Petition

Of

GRACE OCEAN PRIVATE LIMITED, as Owner of the M/V DALI,

And

SYNERGY MARINE PTE LTD, as Manager of the M/V DALI,

for Exoneration from or Limitation of Liability

Docket No. JKB 24-cv-941

IN ADMIRALTY

### **EX PARTE MOTION TO SUBSTITUE DOCUMENT 605-06**

Claimants, appearing herein through court-appointed lead counsel, respectfully move this Court for an Order permitting it to substitute the document attached hereto in the place of, and instead of, Rec. Doc. No. 605-06 as if filed on the date of, and at the time of, the electronic filing of Rec. Doc. No. 605, on the grounds that Rec. Doc. 605-06 contains information that should be redacted, and the attached exhibit corrects the error. Accordingly, Claimants move to replace Rec. Doc. 605-06 with the attached corrected version.

WHEREFORE, Claimants pray that this Motion to Substitute Exhibit in Place of Rec. Doc. No. 605-06, be deemed good and sufficient to correct the erroneously titled document and that the Court order the Clerk of Court to replace Rec. Doc. 605-06 with the attached Exhibit 1.

Respectfully submitted this 2d day of September, 2025.

#### /s/ Margaret Fonshell Ward

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Lead Counsel for Private Economic Loss Claimants

# **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 29th day of August 2025, a copy of the foregoing pleading was served via the court's CM/ECF system on all counsel of record.

/s/ Margaret Ward	
Margaret Fonshell Ward (04586)	